

CLUB MONACO

Canadian Statement Against Forced Labor and Child Labor in Supply Chains

This is a statement made by Club Monaco International, LLC in respect of the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff, referred to as Canada's "Modern Slavery Act" (the "Act"), on behalf of Club Monaco (as defined below), with respect to steps Club Monaco has taken, including during our fiscal year ended January 31, 2024, to ensure that slavery, forced labor, child labor and human trafficking is not taking place in our business, including within our supply chain. This statement is prepared on a consolidated basis for Club Monaco although not all of the entities in the consolidated Club Monaco group of companies is subject to the Act due to the reporting requirements of the Act as we operate a single unified compliance program, with one set of policies, relating to slavery, forced labor, child labor and human trafficking.

Company Overview

Club Monaco International, LLC is a privately held Delaware limited liability company. Club Monaco U.S., LLC, a Delaware liability company, and Club Monaco Corp., an unlimited company formed under the laws of Nova Scotia, are both direct, wholly-owned subsidiaries of Club Monaco International, LLC. Club Monaco Corp. has two direct, wholly-owned subsidiaries: (1) Club Monaco Europe Limited, a private limited company formed under the laws of England and Wales, and (2) Club Monaco S.A.M., a Monte Carlo S.A.M. Club Monaco International, LLC together with all such subsidiaries are referred to herein collectively as "Club Monaco", "we", "us", or "our".

Club Monaco is a Canadian-founded clothing retailer with more than 60 stores in the United States, Canada and worldwide and a global workforce, including store associates, its corporate headquarters in New York, New York, USA, and a distributed sourcing and supply chain team.

We have an extensive established network of worldwide sourcing partners that enables us to meet our customers' needs in an efficient manner without relying on any one vendor or factory or on vendors or factories in any one country. We source finished products and, to a limited extent, raw materials and trim. Raw materials and trim include, among other items, fabric, buttons, thread, and labels. Finished products consist of manufactured and fully assembled products ready for shipment to our customers and our stores (apparel, accessories and related products). Finished products are almost entirely sold under Club Monaco's label, but we will occasionally sell products identifying the third-party brand. Our supply chain is constantly evolving, both at the manufacturer and country level.

Club Monaco Policies and Due Diligence Processes

Club Monaco has built its brand around the consistent production of high-quality products, including apparel and accessories, and its commitment to conducting business according to the highest ethical and legal standards. We require all suppliers, factories, and contractors to adhere to our Operating Guidelines and our policies on Global Compliance and International Customs, among others (collectively, our "Operating Guidelines"), which set forth our business, legal, and ethical expectations and standards in the following areas: occupational health and safety, fair wages and benefits, work hours, transparent record-keeping practices, freedom of association, sub-contracting, customs compliance, product safety, conflicts of interest, anti-bribery, environmental sustainability, and prohibitions on child labor, forced labor, prison labor, discrimination, and harassment.

Club Monaco requires all of its suppliers to prohibit the hiring of forced labor and prevent practices that could contribute to forced labor, child labor and human trafficking. To eradicate forced labor, child labor and human trafficking from our supply chain, we:

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1. verify product supply chains internally and using third-party auditors to ensure that our product supply chains are compliant with our Operating Guidelines and all applicable laws and regulations prohibiting forced labor, child labor, and human trafficking;
2. conduct independent audits of our suppliers to evaluate their compliance with our Operating Guidelines and all applicable laws and regulations prohibiting forced labor, child labor, and human trafficking;
3. require certification by our suppliers that materials incorporated into our products comply with our Operating Guidelines and our Code of Conduct and all applicable laws and regulations prohibiting forced labor, child labor, and human trafficking in countries where our suppliers are doing business;
4. maintain internal accountability standards and procedures for employees and contractors failing to meet our Operating Guidelines and our Code of Conduct prohibiting forced labor, child labor, and human trafficking;
5. prohibit suppliers of Club Monaco's products from sourcing its cotton from regions where there is a significant risk of modern slavery, exploitation or forced labor; and
6. provide training for our supply chain executives and employees on the prevention of forced labor, child labor, and human trafficking.

Our business partners and their affiliates must be transparent in all record keeping and embrace a fundamental effort toward operational efficiencies, social compliance, environmental sustainability and continuous improvement. Suppliers may only subcontract to preapproved suppliers for manufacturing or services according to our corporate requirements.

Parts of Business and Supply Chain that Carry a Risk of Forced Labor and Child Labor and Steps Taken to Address those Risks

We believe that forced and child labor risks in our own workforce are minimal due to the strength of our internal employment policies and procedures. Forced and child labor risks in the apparel industry for companies like ours are most prevalent at upper-tiers of our supply chain as we do not have direct relationships with them and they may be in jurisdictions with weaker protection of workers' rights and where migrant labor is used. We continually monitor compliance with our Operating Guidelines, including the prohibitions against forced and child labor, and promptly address identified risks or violations.

How We Have Addressed Reported Risks or Use of Forced Labor or Child Labor in our Supply Chains

As of January 31, 2024, Club Monaco has not faced situations of forced labor or child labor and has therefore not had to remedy and rectify such situations.

(Signature Appears on Following Page)

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Attestation

In accordance with the requirements of the Act, and in particular, Section 11 thereof, I attest that I have reviewed the information contained in this joint report for the Club Monaco reporting entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act for the reporting year ended January 1, 2024. This report has been approved by the sole member of Club Monaco International, LLC pursuant to Section 11(4)(b)(ii) of the Act.

Archetype Retail, LLC,
as sole member of Club Monaco International, LLC

By: 

Name: Michael Reinstein

Title: Authorized Signatory

Date: May 24, 2024